

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMES REILLY, #184122,

Plaintiff,

v.

Case No. 2:19-11249  
Hon. Linda V. Parker

COLLEEN SPENCER, ET AL.,

Defendant.

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**FOLEY & LARDNER LLP'S MOTION TO WITHDRAW AS COUNSEL**

Foley & Lardner LLP and its undersigned attorney ("Foley") hereby move pursuant to L.R. 83.25 to withdraw as counsel for Plaintiff James Reilly ("Plaintiff"). Foley further requests that the Court grant a 30-day of proceedings to allow Plaintiff an opportunity to make arrangements for alternative counsel.

Dated: October 16, 2019

Respectfully submitted,

**Foley & Lardner LLP**

/s/ Maria A. Ruggirello

Maria A. Ruggirello (P82264)

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**FOLEY & LARDNER LLP'S BRIEF IN SUPPORT OF MOTION TO  
WITHDRAW AS COUNSEL**

Foley & Lardner LLP ("Foley") states as follows in support of its Motion to Withdraw as Counsel:

1. L.R. 83.25 provides that "[a]n attorney may withdraw or be substituted for only on order of the court."
2. MRPC 1.16(b)(6) provides that a lawyer may otherwise withdraw from representing a client where "other good cause for withdrawal exists."
3. Circumstances have arisen that warrant Foley's withdrawal pursuant to MRPC 1.16(b)(6).
4. Foley does not have the capacity to adequately represent Plaintiff in this matter due to recent unexpected professional and personal circumstances that have arisen.

5. Foley further requests that the Court grant a 30-day stay in order to allow Plaintiff an opportunity to secure alternative counsel should Plaintiff desire to do so.

6. Accordingly, Foley respectfully requests that the Court allow the undersigned counsel as well as any other attorney from Foley & Lardner LLP to withdraw as counsel for Plaintiff.

Dated: October 16, 2019

Respectfully submitted,

**Foley & Lardner LLP**

/s/ Maria A. Ruggirello

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**CERTIFICATE OF SERVICE**

I hereby certify that, on October 16, 2019, I filed the foregoing document and this Certificate of Service with the Court using the ECF system.

I also certify that copies of same were enclosed in envelopes, addressed as set forth below, and said envelopes were deposited, with sufficient postage affixed thereon, in a United States mail receptacle located in Detroit, Michigan:

James Reilly Pris. No. 203296  
Saginaw Correctional Facility  
9625 Pierce Road  
Freeland, MI 48623

/s/ Maria A. Ruggirello  
Maria A. Ruggirello (P82264)  
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